

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

NORCAL TEA PARTY PATRIOTS, *et al.*,

Plaintiffs,

v.

INTERNAL REVENUE SERVICE, *et al.*,

Defendants.

Case No. 1:13-cv-000341

Judge Michael R. Barrett

Oral Argument Requested

**CERTAIN FORMER INDIVIDUAL MANAGEMENT DEFENDANTS’
MOTION TO SEAL**

Pursuant to this Court’s May 18, 2017 Order (ECF 345), as modified by this Court’s July 21, 2017 Order (ECR 353), Former Individual Management Defendants, Lois Lerner and Holly Paz, respectfully move this Court to seal their deposition transcripts, which were filed as exhibits in connection with the United States’ Motion for Summary Judgment on Class Action Claim (the “United States’ Motion”) and Plaintiffs’ opposition thereto. Mss. Lerner and Paz also seek to seal the unredacted versions of documents referencing those transcripts, including the unredacted version of Plaintiffs’ Memorandum in Opposition to the United States’ Motion and the unredacted versions of the Plaintiffs’ and the United States’ respective statements of facts.

More specifically, Mss. Lerner and Paz move to seal the following:

- The confidential deposition of Holly Paz, dated March 17, 2015, whose transcript was filed as Exhibit 54 to Plaintiffs’ Memorandum in Opposition to Motion for Summary Judgment (ECF No. 375-3);
- The confidential videotaped deposition of Holly Paz, dated July 7, 2017, whose transcript was filed as Exhibit 43 to the United States’ Motion (ECF No. 355-17) and as Exhibit 65

to Plaintiffs' Memorandum in Opposition to Motion for Summary Judgment (Exhibit 375-4);

- The confidential videotaped deposition of Lois Lerner, dated June 8, 2017, whose transcript was filed as Exhibit 44 to the United States' Motion (ECF No. 355-18) and as Exhibit 46 to Plaintiffs' Memorandum in Opposition to Motion for Summary Judgment (ECF No. 375-2);
- The unredacted version of the United States' Statement of Proposed Undisputed Material Facts in Support of its Motion for Summary Judgment on Class Action Claim (ECF No. 357);
- The unredacted version of Plaintiffs' Memorandum in Opposition to Motion for Summary Judgment (ECF No. 375);
- The unredacted version of Plaintiffs' Statement of Material Facts and Response to IRS's Statement of Proposed Undisputed Facts (ECF No. 375-1);

In support of these filings, Mss. Lerner and Paz hereby incorporate by reference their accompanying Memorandum of Law, and Proposed Order, as well as the arguments made and evidence submitted in support of their prior Motion for Protective Order and supporting materials (ECF 330, 331, 332, 333, 334, 344). By this filing, Mss. Lerner and Paz also oppose The Cincinnati Enquirer's Motion to Unseal (ECF No. 386).

Dated: November 16, 2017

Respectfully Submitted,

/s/ Brigida Benitez

Mark Hayden, Trial Attorney (0066162)
TAFT STETTINIUS & HOLLISTER LLP
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202
Telephone: (513) 381-2838
E-mail: mhayden@taftlaw.com

-and -

Brigida Benitez (admitted *pro hac vice*)
Catherine Cockerham (admitted *pro hac vice*)
Marcus A. Gadson (admitted *pro hac vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
Telephone: (202) 429-3000
E-mail: bbenitez@steptoe.com
E-mail: ccockerham@steptoe.com
Email: mgadson@steptoe.com

*Counsel for Former Individual Management
Defendants Lois G. Lerner and Holly Paz*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of November, 2017, Certain Former Individual Management Defendants' Motion to Seal, Memorandum of Law (1) In Support of Certain Former Individual Management Defendants' Motion to Seal and (2) In Opposition to The Cincinnati Enquirer's Motion to Unseal, and Proposed Order were electronically filed via the Court's CM/ECF system and electronically served upon registered parties via the Court's electronic notification system.

/s/ Brigida Benitez
Brigida Benitez